

Hearing Date and Time: July 22, 2010 at 10:00 a.m.
Objection Date and Time: June 7, 2010 at 4:00 p.m.

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Dawn R. Copley (MI-P53343) (pro hac vice)

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:	:	Chapter 11
	:	
DPH HOLDINGS CORP., <i>et al</i> ,	:	Case No. 05-44481 (RDD)
	:	
Reorganized Debtors.	:	(Jointly Administered)
	:	
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DELPHI CORPORATION, <i>et al.</i> ,	:	
	:	
Plaintiffs,	:	Adv. Pro. No. 07-02201-rdd
v.	:	
	:	
AMBRAKE CORPORATION and	:	
AMBRAKE CORP.,	:	
	:	
Defendants.	:	
	:	
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**NOTICE OF AMBRAKE CORPORATION TO MOTION TO (I) VACATE EXTENSION
ORDERS; AND (II) DISMISS ADVERSARY PROCEEDING**

NOTICE IS HEREBY GIVEN THAT:

Upon the attached motion, dated May 14, 2010, Ambrake Corporation ("Ambrake"), by its attorneys, Dickinson Wright PLLC, filed a Motion to (I) Vacate Extension Orders; and (II) Dismiss Adversary Proceeding (the "Motion"). A hearing with respect to the Motion will be held before the Honorable Robert D. Drain, United States Bankruptcy Judge, of the United States Bankruptcy Court for the Southern District of New York, 300 Quarropas Street, White Plains, New York 10601, on July 22, 2010 at 10:00 a.m., or as soon thereafter as counsel may be heard.

A copy of the Motion may be obtained by (a) contacting the attorneys for Ambrake, Dickinson Wright PLLC, 500 Woodward Avenue, Suite 4000, Detroit, MI 48226 (Attn: Dawn R. Copley), Telephone: (313) 223-3500; (b) accessing the Court's website at <http://www.nysb.uscourts.gov> (please note that a PACER password is needed to access documents on the Court's website); (c) viewing the docket of these cases at the Clerk of the Court, United States Bankruptcy Court for the Southern District of New York, Alexander Hamilton Custom House, One Bowling Green, New York, New York 10004; or (d) accessing the public website maintained by the Debtor's court-appointed claims and noticing agent in these cases at: www.kccllc.net.

The deadline to file any objections and responses to the Motion is **June 7, 2010 at 4:00 p.m.** (the "Objection Deadline").

Objections and response, if any, to the Motion must be in writing and must (a) conform to the Bankruptcy Rules, the Local Rules of the Bankruptcy Court for the Southern District of New York, and any case management orders in these chapter 11

cases, (b) set forth the name of the objecting party, and (c) set forth the basis for the objection and the specific grounds therefore.

PLEASE TAKE FURTHER NOTICE that any responses or objections to the Motion must be in writing, shall conform to the Federal Rules of Bankruptcy Procedures and the Local Rules of the Bankruptcy Court, and shall be filed with the Bankruptcy Court (a) electronically in accordance with General Order M-242 (which can be found at www.nysb.uscourts.gov) by registered users of the Bankruptcy Court's filing system, and (b) by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format (with hard copy delivered directly to Chambers), in accordance with General Order M-182 (which can be found at www.nysb.uscourts.gov), and served in accordance with General Order M-242, and on (i) Dickinson Wright PLLC, Attn Dawn R. Copley, 500 Woodward Avenue, Suite 4000, Detroit, Michigan 48226 and (ii) Butzel Long, Attn: Eric Fisher, 380 Madison Avenue, 22nd Floor, New York, New York 10017, so as to be received no later than the Objection Deadline.

PLEASE TAKE FURTHER NOTICE that objecting parties are required to attend the Hearing. Failure to appear at the Hearing may result in relief being granted or denied upon default.

Respectfully submitted,

DICKINSON WRIGHT PLLC

By: /s/ Dawn R. Copley
Michael C. Hammer (*pro hac vice*)
Dawn R. Copley (*pro hac vice*)
301 East Liberty, Suite 500
Ann Arbor, Michigan 48104-2266
(734) 623-7075
Attorneys for Ambrake Corporation

Dated: May 14, 2010

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	:	
Plaintiffs,	:	Adv. Pro. No. 07-02201-rdd
v.	:	
	:	
AMBRAKE CORPORATION and	:	
AMBRAKE CORP.,	:	
	:	
Defendants.	:	
	:	
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AMBRAKE CORPORATION'S MOTION TO (I) VACATE EXTENSION ORDERS; AND
(II) DISMISS ADVERSARY PROCEEDING

Ambrake Corporation ("Ambrake"), by its attorneys, Dickinson Wright PLLC, for its Motion to (I) Vacate Extension Orders; and (II) Dismiss Adversary Proceeding, relies on its Brief in Support (the "Brief") filed contemporaneously herewith.

Accordingly, for the reasons stated in the Brief, Ambrake respectfully seeks an order:

- (1) Vacating the Extension Orders (as defined in the Brief);
- (2) Dismissing the Adversary Proceeding (as defined in the Brief); and
- (3) For such other relief as is just and proper.

Respectfully submitted,

DICKINSON WRIGHT PLLC

By: /s/ Dawn R. Copley
Michael C. Hammer (*pro hac vice*)
Dawn R. Copley (*pro hac vice*)
301 East Liberty, Suite 500
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Dated: May 14, 2010

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